

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

EXHIBIT B

**PLAINTIFF STATES' OPENING BRIEF TO THE SPECIAL MASTER
FOR THE APRIL 4, 2024 HEARING**

From: Geraldine W. Young
Sent: Tuesday, March 26, 2024 9:05 AM
To: MCCALLUM, Robert; Zeke DeRose III; MAHR, Eric (EJM); ELMER, Julie (JSE); Bryce Callahan; Paul Yetter; John Harkrider; Daniel Bitton; Bracewell, Mollie; KAPLIN, Lauren
Cc: Marc B. Collier; Jonathan Wilkerson; John McBride; Peter M. Hillegas; Noah Heinz; Trevor Young
Subject: RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)
Attachments: 2024.03.19 - Texas v. Google - Chats with Missing Metadata.xlsx

Counsel,

We are following up on our request below regarding continued missing metadata for certain Google chats, identified in the attached excel sent last week. Given the upcoming depositions next week, please let us know the status of these immediately today.

Please also confirm by Thursday, March 28, that Google has produced all relevant, responsive chats for the Google deponents, noticed by the States under Rule 30(b)(1), as well as other Google custodians, with the exception of the forthcoming DTPA productions.

Thank you, Geraldine

From: Geraldine W. Young
Sent: Tuesday, March 19, 2024 12:39 PM
To: MCCALLUM, Robert <rob.mccallum@freshfields.com>; Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bryce Callahan <bcallahan@yettercoleman.com>; Paul Yetter <pyetter@yettercoleman.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>
Cc: Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Trevor Young <Trevor.Young@oag.texas.gov>
Subject: RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

Rob,

Regarding the list of Google Chat bates numbers that you sent in your email below, we have identified Chats in that list that are still missing metadata that Google has produced for other Chats and that Google indicated at the March 7 Special Master hearing were extractable for Chats. The categories of missing metadata and the number of documents are outlined in the below chart, and the specific bates of the Chats with missing metadata are listed in the attached Excel. Please let us know if Google can provide these missing metadata (that, again, have been produced for other Chats). We are still analyzing on our end so may follow up with some additional Chats that are missing these metadata fields.

Missing Metadata Field	Number of Documents/Chats Missing Metadata
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Rev Recipient	180 (excluding attachments)
Rev From	172 (excluding attachments)
Master Date	1,676

Thanks, Geraldine

From: MCCALLUM, Robert <rob.mccallum@freshfields.com>

Sent: Friday, March 1, 2024 3:41 PM

To: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bryce Callahan <bcallahan@yettercoleman.com>; Paul Yetter <pyetter@yettercoleman.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>

Cc: Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Trevor Young <Trevor.Young@oag.texas.gov>

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[External Email – Use Caution]

Counsel –

Please see attached.

Kind regards,
Rob

From: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>

Sent: Monday, February 26, 2024 2:12 PM

To: MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bryce Callahan <bcallahan@yettercoleman.com>; Paul Yetter <pyetter@yettercoleman.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>

Cc: Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Trevor Young <Trevor.Young@oag.texas.gov>

Subject: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

Counsel,

I have attached a letter regarding our Meet and Confer on Friday related to the States' requests for chats, unredacted transcripts and exhibits from the DOJ Search trial, and requests for production related to state-law DTPA claims.

We look forward to continued conversation.

Zeke



Zeke DeRose III

Attorney

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